

Yohannes, Lia

From: Adina Renee Adler <aadler@isri.org>
Sent: Wednesday, April 17, 2019 9:17 PM
To: Yohannes, Lia; Williams, Larke S
Cc: Picardi, Rick; Clark, Andrew D
Subject: RE: Basel proposed amendments on plastic waste (updated day/time)

Friends,

I want to thank you again for our call today about Norway's Basel plastics proposal. Sorry it took me a little while to get some answers back to you...but please call me out if I have forgotten something.

1. Any missing polymers from the B3010 list?
 - I have the same hypothetical question about whether or not to list co-polymers, such as under the ethylene category, because we do have specifications for LDPE and HDPE, which are forms of PET. They are among the highest value plastics, and we very much would want to be sure trade is preserved.
 - In addition to PVC, Polystyrene is also missing.
2. What is the average contamination tolerances within the Specifications?
 - I am not authorized to provide a specific number to be applied across the category because, as noted on the phone, consumer and technology tolerances are different for different grades.
 - 50% of U.S. plastic scrap exports were represented by PET and ethylene. These grades have a 5% tolerance of "contaminants."
 - The other 50% of U.S. plastic scrap exports have a 2% tolerance of "contaminants."
 - "Contaminants" can be other unharmed materials – other plastic grades, dirt, liquid residues, aluminum and paper/cardboard. Please note that the ISRI Specifications are a guideline for negotiations between buyer and seller. If a consignment has contamination that exceeds their agreement (whether the agreement is for the Spec level or for higher), then they work out their differences as per the contract. There is also a stipulation in the Spec that they could agree to payment terms to cover the disposal of those contaminants.
 - There is also a prescription for "prohibited material," which is not tolerated at any level. This is the Basel Convention Annex I and III test plus a range of other materials, including recyclable materials but that these materials would be harmful to the recycling of the defined grade. For example, PVC cannot be in a bale of HDPE colored bottle. [But this also supports Norway's sorting argument.]
 - All this is to say that we need to work on specific definitions of contamination.
3. U.S. plastic scrap exports to OECD countries totaled \$133.4 million in 2018, representing 30% of total exports. For information, Canada and Mexico together represented 70% of that OECD total.
4. Anecdotes of plastic recycling investment in the United States:
 - GDB International (New Brunswick, NJ): Invested in four new pelletizing lines (to take up 60k ft² of plant's 110k ft²) – shifting from collection/sorting/trading to processing/pelletizing. They also hired 25 new employees, including to improve sorting.
 - Green Tech Solution (Blacksburg, SC): Announced in 2018, backed by \$75 million Chinese investment to collect and process plastics
 - Roy Tech Environ (Grant, AL): Announced in 2018, backed by \$2 million Chinese investment for plastic processing plant
 - Merlin Plastics (Delta, British Columbia) and its subsidiary Peninsula Plastics Recycling (Turlock, CA): Installing new sorting lines for mixed-plastic bales to increase processing capacity. Peninsula's 180,000-square-foot facility currently

takes in about 70 million pounds of material a year to produce food-grade PET flake and pellets, with the expansion increasing its intake capacity about 40 million pounds. Merlin's expansion at its Westminster, British Columbia, plant will add 30 million pounds a year of intake capacity for low-density polyethylene, polypropylene, and polystyrene.

- CarbonLite (Los Angeles, CA): Company's newest bottle-grade recycled PET plant, near Allentown, PA, has installed front-end (U.S.-made) recycling equipment with AI-driven robotic sorters that identify recyclables by polymer type and direct sorting decisions. Working together, the optical sensing and AI technologies can suppress separation of clamshells and thermoform trays and target only PET bottles. The companies expect installation to be complete by the end of this year and the plant to be fully operational in 2020, processing 14 tons an hour of postconsumer PET and producing 80 million pounds a year of recycled PET pellets.
5. Visit to a local plastic recycling plant: I am looking into this. We just had a shake-up today in our membership department (who would have helped me find companies to visit), so this may take a little longer, but I'll let you know ASAP.
 6. Definition of recycling (*e.g.*, where does sorting fit in): This I also need to come back to you. Our President is ill, and I need to run my response by her first.

I look forward to the stakeholder meeting. P.S. The reason I won't be there in person is that I was invited to a "Policy Innovation Workshop" at Ocean Conservancy to talk through policy issues related to marine plastics. Should be a very interesting exercise with them.

Regards,
Adina

-----Original Appointment-----

From: Yohannes, Lia [<mailto:Yohannes.Lia@epa.gov>]

Sent: Thursday, April 11, 2019 1:19 PM

To: Yohannes, Lia; Adina Renee Adler; Williams, Larke S

Cc: Picardi, Rick; Clark, Andrew D

Subject: Basel proposed amendments on plastic waste (updated day/time)

When: Wednesday, April 17, 2019 9:30 AM-10:30 AM (UTC-05:00) Eastern Time (US & Canada).

Where: Call-in info in invite

Here's the dial-in info:

Conference # [REDACTED]

Conference Extension: [REDACTED]

Participant Code: [REDACTED]

Look forward to touching base!

Lia